

Sean P. Flynn (SBN 15408)
GORDON REES SCULLY MANSUKHANI
1 East Liberty Street
Suite 424
Reno, NV 89501
Telephone: (775) 467-2610
Email: sflynn@grsm.com

Attorneys for Defendant
Cook County Health

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DENISE FAIVRE, individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

PERRY JOHNSON & ASSOCIATES, INC.,
NORTHWELL HEALTH, INC., and COOK
COUNTY HEALTH,

Defendants.

CASE NO. 2:23-cv-01926

**STIPULATION TO EXTEND
DEFENDANT COOK COUNTY
HEALTH'S DEADLINE TO RESPOND
TO COMPLAINT**

TO THIS HONORABLE COURT, TO THE CLERK OF THE UNITED STATES
DISTRICT COURT FOR THE DISTRICT OF NEVADA, AND TO ALL PARTIES
THROUGH THEIR COUNSEL OF RECORD HEREIN:

Pursuant to Federal Rule of Civil Procedure, Rule 6(b) and Local Rule 6-1, Plaintiff
Denise Faivre, on the one hand, and Defendant Cook County Health ("CCH") on the other hand,
stipulate to an extension of time for CCH to respond to Plaintiff's complaint in this matter.

Plaintiff filed her complaint on November 20, 2023, and served CCH on November 30,
2023. CCH's response is due on December 21, 2023.

On or about November 30, 2023, CCH retained Gordon & Rees LLP as counsel in this
matter. CCH has requested an extension of time to respond to the Complaint, up to and

1 including January 29, 2024. CCH requires additional time to investigate factual and legal issues
2 and respond to the Motion for Transfer and Centralization filed by certain plaintiffs before the
3 Judicial Panel on Multidistrict Litigation. Counsel for Plaintiff has agreed to the extension.

4 There does not appear to have been entered a scheduling order in this case; thus, there are
5 no dates set for trial, motions, or discovery.

6 IT IS HEREBY STIPULATED that CCH shall have up to and including January 29,
7 2024, to respond to Plaintiff's complaint.

8 **IT IS SO STIPULATED.**

9
10 Respectfully submitted,

11 Dated: December 21, 2023

GORDON REES SCULLY MANSUKHANI

12
13 By: /s/ Sean Flynn
14 Sean Flynn
15 Attorneys for Defendant
16 Cook County Health

17 Dated: December 21, 2023

STRANCH, JENNINGS & GARVEY, PLLC

18
19 By: /s/ Nathan Ring
20 Nathan Ring
21 Attorneys for Plaintiff
22 Denise Faivre

23 **IT IS SO ORDERED:**

24 DATED: December 21, 2023

25
26
27
28 
UNITED STATES MAGISTRATE JUDGE